

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Patricia Halsey	:	CHAPTER 13
Debtor	:	
	:	BANKRUPTCY NO. 19-11696

DEBTOR'S OBJECTION TO PROOF OF CLAIM 9)

Patricia Halsey, the Debtor in the above matter, by her attorney, Gary E. Thompson, Esquire, hereby presents the following Objection to Proof of Claim of US Bank National, and in support thereof respectfully avers as follows:

1. US Bank National, filed a Secured Proof of Claim with this Court on or about **May 29, 2019** in the total amount of \$296,987.99, of which \$227,699.05 is designated as an arrearages Claim. (A copy of the Proof of Claim and can be found as Claim #1 of the Claims Register).
2. The Debtor objects to the creditor's claim on the following grounds:
 - a. The Creditor fails to attach sufficient documentation to prove the validity of the debt;
 - b. The Debtor was approved for a Loan Modification on or about April 20, 2019 and the terms and conditions of the Loan Modification are significantly different from the Proof of Claim. A true and correct copy of the Loan Modification is attached hereto as Exhibit "A";

WHEREFORE, the Debtor prays that the Court enter an Order SUSTAINING her Objection to the Proof of Claim of US Bank National.

Respectfully submitted,

/s/ Gary E. Thompson

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Dated: August 26, 2019